

Apr-10-07

02:14pm

From-PILLSBURY WINTHROP SHAW PITTMAN LLP

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5  
Attorneys for Defendant  
6 FUDENNA BROTHERS, INC.

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 FAITH TURNAGE,

11 Plaintiff,

12 vs.

13 FUDENNA BROTHERS, INC.; DR.  
14 VENITA ANTONIA LUE dba  
15 INTEGRATIVE PSYCHOTHERAPEUTIC  
SERVICES; and DOES 1-25, Inclusive,

16 Defendants.  
17

Case No. C07-01505-EDL

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANT FUDENNA  
BROTHER'S INC. TO RESPOND  
TO COMPLAINT**

18 **RECITALS**

19 A. On March 23, 2007, Plaintiff Faith Turnage ("Plaintiff") caused her  
20 Complaint to be served on Defendant Fudenna Brothers, Inc. ("Defendant").

21 B. Defendant's response to Plaintiff's Complaint is currently due on April 12,  
22 2007.

23 C. Defendant has only recently engaged counsel to assist it in responding to  
24 Plaintiff's Complaint.

25 G. To avoid prejudice to Defendant, Plaintiff and Defendant therefore agree to  
26 extend the time for Defendant to respond to Plaintiff's Complaint, as set forth below.  
27

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## STIPULATION

Plaintiff Faith Turnage and Defendant Fudenna Brothers, Inc. hereby stipulate that Defendant Fudenna Brothers, Inc. shall have until April 26, 2007, to respond to Plaintiff Faith Turnage's Complaint.

Dated: April <sup>10</sup>~~7~~, 2007

PILLSBURY WINTHROP SHAW PITTMAN LLP  
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400 Capitol Mall, Suite 1700  
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By /s/ Amy L. Pierce  
Amy L. Pierce  
Attorneys for Defendant  
FUDENNA BROTHERS, INC.

## DECLARATION PURSUANT TO GENERAL ORDER 45 § X.B

I, AMY L. PIERCE, hereby declare pursuant to General Order 45, § X.B, that I have obtained the concurrence in the filing of this document from each of the other signatories listed below.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed on April <sup>10</sup>~~7~~, 2007, at Sacramento, California.

/s/ Amy L. Pierce  
Amy L. Pierce

Dated: April <sup>10</sup>~~7~~ 2007

PAUL L. REIN, ESQ.  
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By   
Paul L. Rein  
Attorney for Plaintiff  
FAITH TURNAGE

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STIPULATION AND [PROPOSED] ORDER TO  
EXTEND TIME FOR DEFENDANT FUDENNA  
BROTHERS, INC. TO RESPOND TO COMPLAINT  
Case No. C07-01505-EDL

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From-PILLSBURY WINTHROP SHAW PITTMAN LLP

**[PROPOSED] ORDER**

Pursuant to the foregoing Stipulation, and good cause appearing,

IT IS HEREBY ORDERED that the Defendant Fudenna Brothers, Inc. shall have until April 26, 2007, to respond to Plaintiff Faith Turnage's Complaint.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: April 12, 2007

Hon. Elizabeth D. Laporte  
United States District Court

IT IS SO ORDERED

*Elizabeth D. Laporte*  
Judge Elizabeth D. Laporte

